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*Attorneys for Plaintiffs Shannon Ray, Khala Taylor,  
Peter Robinson, Katherine Sebbane, and Rudy Barajas  
Individually and on Behalf of All Those Similarly Situated*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

SHANNON RAY, KHALA TAYLOR, PETER  
ROBINSON, KATHERINE SEBBANE, and  
RUDY BARAJAS Individually and on Behalf of  
All Those Similarly Situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC  
ASSOCIATION, an unincorporated association,

Defendant.

Case No. 1:23-cv-00425

**CLASS ACTION**

**JOINT NOTICE OF SETTLEMENT IN  
PRINCIPLE**

Judge: Hon. William B. Shubb

1 The Certified Class and Defendant National Collegiate Athletic Association (“NCAA”) are  
2 pleased to inform the Court that they have reached a settlement of the matter in principle. The  
3 parties are in the process of preparing the settlement documents. In light of the parties’ settlement  
4 in principle, the parties respectfully request that the Court:

- 5 1. Remove from the October 14, 2025 hearing calendar all motions currently scheduled  
6 to be heard in the case;
- 7 2. Stay all deadlines in the case, pending the Court’s ruling on the Certified Class’s  
8 upcoming motion for preliminary approval of the settlement; and
- 9 3. Permit the Certified Class 30 days to file its motion for preliminary approval of the  
10 settlement.

11 The Parties are aware of Local Rule 160, which provides that “the Court shall fix a date  
12 upon which the documents disposing of the action or motion must be filed, which date shall not  
13 be more than twenty-one (21) days from the date of said notification, absent good cause.” Local  
14 Rule 160 further provides: “The Court may, on good cause shown, extend the time for filing the  
15 dispositional papers.” The Parties respectfully submit that there is good cause to extend the time  
16 to file dispositional papers given the nature of this action as a nationwide putative antitrust class  
17 action, the requirement under the Federal Rules to file a motion for preliminary approval of the  
18 settlement of such an action, and the number and complexity of issues involved in reducing the  
19 parties’ settlement in principle to a comprehensive settlement agreement.

20 We thank the Court for its consideration.

21  
22 DATED: October 10, 2025

Respectfully submitted,

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